

DEPARTMENT OF INFORMATION TECHNOLOGY
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 5TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-7684 □ Fax: (808) 527-6272 □ Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR



GORDON J. BRUCE
DIRECTOR & CIO

**Before the
Federal Communications Commission
Washington, D.C. 20554**

The Honorable Kevin J. Martin
Federal Communication Commission
445 12th Street SW
Washington, DC 20554

Dear Chairman Martin:

In the Matter of

Service Rules for the 698-746, 747-762 and 777-792 MHz Bands)	WT Docket No. 06-150
)	
Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems)	CC Docket No. 94-102
)	
Section 68.4(a) of the Commission's Rules Governing Hearing Aid-Compatible Telephones)	WT Docket No. 01-309
)	
Biennial Regulatory Review – Amendment of Parts 1, 22, 24, 27, and 90 to Streamline and Harmonize Various Rules Affecting Wireless Radio Services)	WT Docket No. 03-264
)	
Former Nextel Communications, Inc. Upper 700 MHz Guard Band Licenses and Revisions to Part 27 of the Commission's Rules)	WT Docket No. 06-169
)	
Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band)	PS Docket No. 06-229
)	
Development of Operational, Technical and Spectrum Requirements for Meeting Federal, State and Local Public Safety Communications Requirements Through the Year 2010)	WT Docket No. 96-86
)	

Comments of the City and County of Honolulu

The City and County of Honolulu (the "City"), hereby, submits these comments in response to the Commission in the above-captioned proceeding.

The City supports the Commission's decision to allow broadband capabilities in the 700 MHz public safety band. The City, however, is concerned with the tentative conclusion of the Commission to reserve the public safety wideband spectrum for a single national broadband licensee. We are doubtful that the designation of a single licensee to develop and operate a nationwide interoperable broadband network will best serve the needs of the City's public safety agencies. Of particular concern are underutilized areas. Universal coverage is important for the delivery of life safety services.

The City believes that it should have the option to design, build, and operate a private, local-based broadband network. The Commission's decision to create a single licensee will virtually eliminate these options for the City and the region. The City respectfully requests that the option of implementing either a broadband or wideband system be left to the local region who best understands the requirements of the area.

No two City or States are the same. Our unique island situation requires a different approach compared to land-locked locations and vice versa. We humbly request that all issues be appropriately addressed before proceeding. It is important that we keep the roles of our first responders first and foremost when it comes to the use of the public safety communication bands.

Thank you for giving us the opportunity to submit testimony.

Sincerely



Gordon J. Bruce, Chair
Public Safety Oversight Committee

cc: The Honorable Mufi Hannemann
Mayor, City and County of Honolulu
Wayne M. Hashiro, P.E. Deputy Director
Trudi S. Saito, Deputy Managing Director
Public Safety Oversight Committee (PSOC)